

Data Submitted (UTC 11): 1/30/2024 6:34:16 PM

First name: Jake

Last name: Duncan

Organization:

Title:

Comments: Thank you for providing me with the opportunity to provide comments on the proposed USDA Forest Service proposed directive FSM 2355 Climbing Opportunities #ORMS-3524

I have enjoyed climbing in the Red River Gorge for 5 years. This includes having climbed in the Clifty Wilderness Area.

I am a member of the Red River Gorge Climbers' Coalition and the Access Fund and the Southeast Climbers' Coalition.

I support the position of the Red River Gorge Climbers' Coalition (RRGCC) in their comments requesting for the proposed directive FSM 2355 to be withdrawn and revised to address the RRGCC's concerns that:

1. The FSM 2335 climbing management policy will result in a prohibition on climbing development, fixed anchor maintenance, and new fixed anchor placement that if adopted, will most likely result in climber injuries or even deaths.
2. The FSM 2335 reliance on the development of Climbing Management Plans before actions can be taken by climbers is unworkable.
3. Climbing Management Plan development should be consistent with recreational goals, standards, and desired future conditions provided in a Land Management Plan.
4. Climbing Management Plan guidance should include Forest Service procedures for securing funding and resources in support of climbing management objectives through agency budgeting and congressional appropriations.
5. As established by the Daniel Boone National Forest Land Management Plan, FSM 2335 revisions should also reflect a policy direction of allowing maintenance of fixed anchors to be performed by climbers.
6. Language for conducting law enforcement patrols at climbing opportunities be removed from FSM 2355 and would be a waste of precious Forest Service resources.
7. The policy direction for Wilderness Areas in FSM 2355 be revised to generally allow for historically present fixed anchors to remain and to be maintained.